



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

January 4, 2024

BY ECF

The Honorable John G. Koeltl
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl St.
New York, NY 10007

APPLICATION GRANTED
SO ORDERED

1/5/24 *John G. Koeltl*
John G. Koeltl, U.S.D.J.

Re: *Ali Majed Soudi Alfar v. Quarantillo, et al.*, 22 Civ. 10260 (JGK)

Dear Judge Koeltl:

This Office represents defendants (the “government”) in the above-referenced action brought pursuant to 8 U.S.C. § 1421(c), in which plaintiff challenges the denial of his Application for Naturalization (Form N-400) after he appeared for an interview related to this application. I write respectfully on behalf of the parties to provide an update and to request that the Court hold this matter in abeyance for 60 days.

By way of background, plaintiff initially filed this action on December 2, 2022. Following the correction of certain filing deficiencies, the government was served in August 2023. The government filed its response to the complaint on November 13, 2023, in the form of an answer. Dkt. No. 20. Plaintiff filed a reply, responding to the numbered paragraphs in the government’s answer, on December 15, 2023. Dkt. No. 24. To date, the parties have not filed any motions or submitted memoranda of law.

On December 18, 2023, the Court directed plaintiff “to provide the Court with paper courtesy copies of all papers filed in connection with the fully briefed petition for review of a denial of an application for naturalization.” Dkt. No. 25. However, because to date the parties have, in essence, submitted only pleadings, the parties respectfully request that the Court not proceed to adjudicate this dispute on the pleadings and without the benefit of an administrative record.

Moreover, during this time the parties have engaged in discussions to resolve this matter consensually, and they believe it may be possible to resolve this matter without the need for judicial intervention in the next 60 days. Accordingly, the parties respectfully request that the Court permit the parties to submit on March 4, 2024, either a proposed stipulation resolving this matter or a further status report advising the Court of the parties’ progress on this matter.

Honorable John G. Koeltl
Page 2

We thank the Court for its consideration of this request.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: s/ Anthony J. Sun
ANTHONY J. SUN
Assistant United States Attorney
86 Chambers St., 3rd Floor
New York, New York 10007
(212) 637-2810

cc: (by ECF)
Robert J. Maher, Esq.
Counsel for Plaintiff